

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Courts
Southern District of Texas

FILED

June 11, 2023

United States of America
v.Denisse Ahumada-MARTINEZ
YOB: 1989

Defendant(s)

Case No. 7:23-mj-1070

Nathan Ochsner, Clerk of Court

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 10, 2023 in the county of Brooks in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC Sec. 841(a) & 841(b)(1)(A)

Offense Description

Possession with Intent to Distribute more than 5 kilograms of a Schedule II
Controlled Substance to wit: 42 kilograms of Cocaine

This criminal complaint is based on these facts:

See Attachment "A".

☒ Continued on the attached sheet.

/s/ Nicholas Landsman

Complainant's signature

Approved by: AUSA Laura Garcia.

Nicholas Landsman, DEA Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to and attested
telephonically per Fed. R. Cr.P.4.1, and probable cause found on:Date: 6/11/23 @ 7:23 p.m.City and state: McAllen, Texas
Judge's signature

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On June 10, 2023, United States Border Patrol Agents (USBP) assigned to the Falfurrias Border Patrol Checkpoint conducted an immigration inspection on a white Mazda SUV bearing Tamaulipas Mexico license plates. The driver of the vehicle was identified as Denisse Ahumada-MARTINEZ. MARTINEZ was referred to secondary inspection. MARTINEZ consented for the vehicle to be X-rayed. During the X-ray, Border Patrol Agents discovered anomalies inside the seats of the vehicle. A physical search revealed bundles wrapped with duct tape and foil, consistent with the packing of narcotics. Approximately forty-two (42) kilograms of suspected cocaine were discovered in multiple locations within the vehicle, including the seats and door panels. A field test was conducted on a bundle which tested positive for the characteristics of cocaine.

On the same date, DEA Special Agents (SA) were contacted by USBP, who advised of the discovery of the bundles of cocaine. SAs proceeded to the Falfurrias Checkpoint to interview MARTINEZ.

On the same date, SAs met with MARTINEZ. MARTINEZ was provided her Miranda warnings and she choose to provide a statement. MARTINEZ admitted she drove the white Mazda SUV from Mexico into the United States through the Hidalgo Port of Entry. She stated she was to transport the narcotics concealed in the vehicle to San Antonio, Texas. MARTINEZ also stated she has transported narcotics in the past as well.

MARTINEZ is a Mexican citizen who resides in Reynosa, Mexico and is a United States VISA holder.